## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS **CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA §

§ § VS. CRIMINAL NO. 2:20-CR-00845-(1)

JOHN CHARLIE KOFRON §

### **UNOPPOSED MOTION FOR CONTINUANCE**

#### TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES THE DEFENDANT, JOHN CHARLIE KOFRON, by and through his attorney, CHARLES CECIL STARCHER, moves for an Unopposed Motion for Continuance of the Final Pretrial Conference and Jury Selection and Trial. As grounds for this motion, Mr. Charles Cecil Starcher shows as follows:

<u>I.</u>

Mr. John Charlie Kofron is charged by Indictment with Count One, Possession with intent to Distribute a Control Substance. Mr. Kofron pled not guilty on July 7, 2020. Final Pretrial Conference is scheduled for September 2, 2020 at 9:00 a.m. & Jury Selection and Trial on September 14, 2020 at 9:00 a.m.

#### II.

Defendant has tested positive for Coronavirus and is in quarantine for another 11 days. Therefore, Counsel for Defendant is requesting additional time to obtain and review discovery. Counsel needs additional time to adequately prepare for trial in this cause. Counsel is requesting a continuance of at least 30 days.

### III.

Counsel for Mr. Kofron has consulted with Assistant United States Attorney Yifei Zheng, who is not unopposed to this continuance. For these reasons, Mr. Kofron requests a continuance of the Final Pretrial Conference and Jury Selection and Trial.

### <u>IV.</u>

This motion is not made for purposes of delay but that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court enter its order continuing this cause for at least thirty (30) days.

Respectfully submitted,

/s/ Charles Cecil Starcher Charles Cecil Starcher The Starcher Law Firm Federal ID. 17726 102 N. Staples Corpus Christi, Texas 78401 Phone: 361) 882-0800

Fax: 361) 882-0803 Attorney for Defendant John Charlie Kofron

# **CERTIFICATE OF SERVICE & CONSULTATION**

I Charles Cecil Starcher, certify that on this the 25<sup>h</sup> day of August, 2020, a copy of the foregoing motion was delivered via electronic notification to: AUSA Yifei Zheng and that I have consulted with her and she is unopposed to the granting of this motion.

<u>/s/ Charles Cecil Starcher</u> Charles Cecil Starcher

Ms. Yifei Zheng Assistant United States Attorney 800 N. Shoreline, Suite 500 Corpus Christi, Texas 78401

# IN UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§ 8
VS.	\$ \$ \$ CRIMINAL NO. 2:20-cr-00845-(1)
JOHN CHARLIE KOFRON	§ §
	ORDER
The defendant's Motion for Conti	inuance is GRANTED/DENIED.
Final Pretrial Hearing is rescheduled for th	neday of, 2020, at
o'clock. Jury Selection and Trial i	is scheduled for the day of, 2020
SIGNED on this	day of August, 2020.
	UNITED STATES DISTRICT COURT JUDGE